

**REMARKS**

Pending in the application are claims 1-24, of which claims 1, 6, 10, 18, 21, 22, 23 and 24 are independent.

**Claim Rejections - 35 U.S.C. §102**

Claims 6, 10-12, 14-17 and 23 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Number 6,141,660 ("Bach"). Applicants respectfully traverse this rejection for the following reasons.

**Claim 6**

Independent claim 6 is directed to a method for interacting with a server. The method includes the step of *receiving a file containing CLI registration information from the server*. The method also includes the steps of storing the file, and *parsing the file to decipher information pertaining to CLI commands*.

Applicants submit that the cited prior art reference fails to disclose each and every element of the claimed invention. Applicants submit that Bach fails to disclose the steps of *receiving a file containing CLI registration information from the server, and parsing the file to decipher information pertaining to CLI commands*, as recited in claim 6. The Examiner asserts that Bach discloses the claimed invention at column 17, lines 3-67. Applicants respectfully disagree.

Bach discloses in Fig. 4 a client computer (100) including a graphical user interface (402), a command line interface (403) and a class definition tool (400). Bach also discloses the class definition tool (400) generates class specifications for an object that can access a database. Bach clearly discloses that the client computer (100) downloads the DBD (Database Definition) files and COBOL copylib files, and parses the DBD files and COBOL copylib files to identify the DBD segments and COBOL records. See Bach, Figs. 4, 5, 6D, 6E, 6F, 6G and 6H, column 10, lines 52-58, and column 13, lines 3747. The DBD segments and COBOL records are used to generate the class specifications for the object.

In comparison, the claimed invention enables the user of a client to dynamically add his/her own CLI commands. When a new command is added, the claimed invention also enables other clients to download a file containing CLI registration information from a server so that other clients can learn the new command. Bach does not disclose that the client computer (100) receives a file containing CLI registration information from the server, and parses the file to decipher information pertaining to CLI commands. The files received by the client computer (100) in Bach are the DBD files and COBOL copylib files, not the files containing CLI registration information. Furthermore, the DBD files and COBOL copylib files are parsed to identify the DBD segments and COBOL records, not to decipher information pertaining to CLI commands, as recited in the claimed invention.

In light of the above arguments, Applicants respectfully submit that Bach fails to disclose each and every element of claim 6. Applicants therefore request the Examiner to reconsider and withdraw the rejection of claim 6, and pass the claim to allowance.

Claims 10-12, 14-17 and 23

Independent claim 10 is directed to a method for a server device to interact with a database. The method includes the step of receiving a request from a command line interface client and mapping the request to an instance of an object class. *The object class instance queries the database to respond to the request and instructs the construction of an outgoing user interface.* The method also includes the step of *constructing the outgoing user interface* and sending a response to the request to the command line interface client. Claims 11, 12 and 14-17 depends upon claim 10. Claim 23 is a medium claim that parallels claim 10.

Applicants submit that the cited prior art reference fails to disclose each and every element of the claimed invention. Applicants submit that Bach fails to disclose that *the object class instance queries the database to respond to the request and instructs the construction of an outgoing user interface*, as recited in claim 10. The Examiner asserts in the Office Action that Bach discloses the claimed invention at column 10, lines 28-58 and column 16, lines 63 through column 17, line 67. Applicants respectfully disagree.

Bach discloses a server (102) in Fig. 1 including an application program (106), an objects framework (108) and a DBMS (110). The class definitions generated by the class definition tool (400) are instantiated as objects in the objects framework (108) that encapsulate data retrieved from the database (112). See Bach, column 21, lines 6-17. Bach discloses that the application program (106) accesses the hierarchical database (112) using the objects framework (108). The data objects provide the mechanisms that allow the application program (106) to access the database data. See Bach, column 5, lines 46-56. Bach, however, does not disclose that the data objects query the database to respond to the request and instructs the construction of an outgoing user interface, as recited in the claimed invention. The data objects in Bach simply encapsulate data retrieved from the database (112) to provide the mechanisms that allow the application program (106) to access the database data.

Additionally, Applicants submit that Bach fails to disclose the step of constructing the outgoing user interface, as recited in claim 10. Bach discloses that the client computer (100) generates selected class definitions (.HPP files), class implementations (.CPP files) and web browser forms. See Bach Fig. 6J and column 14, lines 16-28. Bach discloses that the source code for the class definitions and class implementations is uploaded to the server computer (102) and the web browser forms are not uploaded to the server computer (102). In Bach, the web browser forms are *generated* and used for display in the *client* computer (100). Bach does not disclose constructing the outgoing user interface in the *server* device, as recited in the claimed invention.

In light of the above arguments, Applicants respectfully submit that Bach fails to disclose each and every element of claim 10. Applicants therefore request the Examiner to reconsider and withdraw the rejection of claims 10-12, 14-17 and 23, and pass the claims to allowance.

#### Claim Rejections Under 35 U.S.C. §103(a)

Claims 1-5, 7-9, 18-22 and 24 are rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent Number 6,141,660 (“Bach”) in view of United States Patent Number 6,625,590 (“Chen”). Applicants respectfully traverse the rejection for the following reasons.

Claims 1-5 and 22

Independent claim 1 is directed to a method for a server device to interact with a client. The method includes the step of *downloading a file containing CLI registration information to the client*. The method also includes the step of *receiving at least one update from the client containing at least one client originating CLI command*. Claims 2-5 depend upon claim 1. Claim 22 is a medium claim that parallels claim 1.

Applicants respectfully submit the cited prior art references fail to teach or suggest all of the limitations of independent claim 1. Applicants submit that Bach and Chen fail to teach downloading a file containing CLI registration information to the client. The Examiner asserts that Bach teaches this limitation of the claimed invention at column 10, lines 27-58 and column 17, lines 1-12. Applicants respectfully disagree.

Bach teaches in Fig. 4 a client computer (100) including a graphical user interface (402), a command line interface (403) and class definition tool (400). Bach also teaches the class definition tool generates class specifications for an object that can access a database. Bach clearly teaches that the client computer (100) downloads the DBD (Database Definition) files and COBOL copylib files, and parses the DBD files and COBOL copylib files to identify the DBD segments and COBOL records. See Bach, Figs. 4, 5, 6D, 6E, 6F, 6G and 6H, column 10, lines 52-58, and column 13, lines 3747. The DBD segments and COBOL records are used to generate the class specifications for the object. Bach does not teach downloading a file containing CLI registration information to the client. The files received by the client computer in Bach are not the files containing CLI registration information.

Additionally, Applicants submit that Bach and Chen fail to teach receiving at least one update from the client containing at least one client originating CLI command. The Examiner asserts that Chen teaches this limitation of the claimed invention at column 7, lines 25-42 and column 9, lines 2-27. Applicants respectfully disagree.

Chen teaches in Fig. 2 a network environment including an operator consol (62), a network device (64) and a file server (66). The operator consol (62) and the file server (66)

include a Unified Command Interface (UCI) (10) that can be utilized to create, update, retrieve, and store network management information in the network device (64). Chen teaches that the UCI (10) includes an in-line help facility (20) that can be invoked by typing a "?" at a location in a UCI command line. For example, if the operator simply types "?" at the UCI prompt, UCI will display a list of all operational directives.

The Examiner appears to deem the UCI command as the client originating CLI command of the claimed invention. Applicants submit that Chen does not teach the client originating CLI command of the claimed invention. In the claimed invention, the user of the client is provided with a pre-defined set of base commands, for example, for a management application in a server. In addition to the base command, the claimed invention enables the user of the client to dynamically add his/her own CLI commands, for example, for plug-in applications. The plug-in applications may be registered with the management application. When a new command is added for a new plug-in application, the claimed invention also enables other clients to locate and learn the new command by downloading a file containing CLI registration information from the server. Chen does not allow the user of the client to dynamically add his/her own CLI commands.

Although Chen teaches that the operator can cut and paste valid UCI command inputs provided by the in-line help facility (20) to enter UCI commands, Chen does not teach the client originating CLI command of the claimed invention. In Chen, the operator can enter a command by cutting and pasting inputs provided by the in-line help facility (20). In contrast, the client originating CLI command of the claimed invention is added by the client for the new plug-in applications registered with the management application, and is new to other clients so that other clients should learn the client originating CLI command to use it. The UCI command taught in Chen does not correspond to the client originating CLI command of the claimed invention.

In light of the above arguments, Applicants respectfully submit that Bach and Chen fail to teach or suggest all of the limitations of claims 1 and 22. Claims 2-5, which depend from claim 1, are not rendered obvious over the cited prior references. Applicants therefore request the Examiner to reconsider and withdraw the rejection of claims 1-5 and 22, and pass the claims to allowance.

Claims 7-9

Claim 7-9 depend from claim 6. Chen is cited by the Examiner to provide teachings for the limitations added in claims 7-9.

Applicants respectfully submit the cited prior art references fail to teach or suggest all of the limitations of independent claim 6. Applicants submit that Bach and Chen fail to teach receiving a file containing CLI registration information from the server and parsing the file to decipher information pertaining to CLI commands, as recited in claim 6.

Chen teaches in Fig. 2 a network environment including an operator consol (62), a network device (64) and a file server (66). The operator consol (62) and the file server (66) include a Unified Command Interface (UCI) (10) that can be utilized to create, update, retrieve, and store network management information in network device (64). Chen teaches that the UCI (10) includes an in-line help facility (20) that can be invoked by typing a "?" at a location in a UCI command line. For example, if the operator simply types "?" at the UCI prompt, UCI will display a list of all operational directives.

In contrast, the claimed invention provides the user of the client with the ability to dynamically add his/her own CLI commands. When a new command is added, the claimed invention enables other clients to locate and learn the new command by downloading a file containing CLI registration information from a server. Chen does not allow the user of the client to dynamically add his/her own CLI commands. Chen does not teach *receiving a file containing CLI registration information from a server and parsing the file to decipher information pertaining to CLI commands*, as recited in claim 6.

In light of the above arguments, Applicants respectfully submit that Bach and Chen fail to teach or suggest all of the limitations of claim 6. Claims 7-9, which depend from claim 6, are not rendered obvious over the cited prior references. Applicants therefore request the Examiner to reconsider and withdraw the rejection of claims 7-9 and pass the claims to allowance.

Claims 18-20 and 24

Claim 18 is directed to a method for a client device to interact with a server. The method includes the step of sending a request from a command line interface of a command line interface client to a server. The method also includes the step of receiving a response to the request at the command line interface client. The command line interface client presents a user with the response and utilizes at least one of *commands originating at the client* and commands originating at the server. Claims 19 and 20 depend from claim 18. Claim 24 is a medium claim that parallels claim 18.

Applicants respectfully submit the cited prior art references fail to teach or suggest all of the limitations of independent claim 18. Applicants submit that Bach and Chen fail to teach that the command line interface client presents a user with the response and utilizes at least one of *commands originating at the client* and commands originating at the server, as recited in claim 18. The Examiner asserts that Chen teaches this limitation of the claimed invention at column 7, lines 25-42 and column 9, lines 2-27. Applicants respectfully disagree.

Chen teaches in Fig. 2 a network environment including an operator consol (62), a network device (64) and a file server (66). The operator consol (62) and the file server (66) include a Unified Command Interface (UCI) (10) that can be utilized to create, update, retrieve, and store network management information in network device (64). Chen teaches that the UCI (10) includes an in-line help facility (20) that can be invoked by typing a "?" at a location in a UCI command line. For example, if the operator simply types "?" at the UCI prompt, UCI will display a list of all operational directives.

The Examiner appears to deem the UCI command as the commands originating at the client recited in the claimed invention. Applicants submit that Chen does not teach the commands originating at the client recited in the claimed invention. In the claimed invention, the user of the client is provided with a pre-defined set of base commands, for example, for a management application in a server. In addition to the base command, the claimed invention enables the user of the client to dynamically add his/her own CLI commands, for example, for plug-in applications. The plug-in applications may be registered with the management application. When a new command is added for a new plug-in application, the claimed invention also enables other clients to locate and learn the new command by downloading a file containing

CLI registration information from the server. Chen does not allow the user of the client to dynamically add his/her own CLI commands.

Although Chen teaches that the operator can cut and paste valid UCI command inputs provided by the in-line help facility (20) to enter UCI commands, Chen does not teach the commands originating at the client recited in the claimed invention. In Chen, the operator can enter a command by cutting and pasting inputs provided by the in-line help facility (20). In contrast, the command originating at the client recited in the claimed invention is the command added by the client for the new plug-in applications registered with the management application. The command originating at the client recited in the claimed invention is new to other clients so that other clients should learn the commands originating at the client to use it. The UCI command taught in Chen does not correspond to the command originating at the client recited in the claimed invention.

In light of the above arguments, Applicants respectfully submit that Bach and Chen fail to teach or suggest all of the limitations of claims 18 and 24. Claims 19 and 20, which depend from claim 18, are not rendered obvious over the cited prior references. Applicants therefore request the Examiner to reconsider and withdraw the rejection of claims 18-20 and 24 and pass the claims to allowance.

#### Claim 21

Claim 21 is directed to a medium containing an HTTP based software command line interface tool. The medium includes a predetermined set of commands for executing tasks. The medium also includes a protocol for automatic connection with a remote session and management of such connection, including downloading of commands from a server of the remote session. The interface tool enables a client to *add new interface commands to the interface tool* and remotely execute the new interface commands.

Applicants respectfully submit the cited prior art references fail to teach or suggest all of the limitations of independent claim 21. Applicants submit that Bach and Chen fail to teach that the interface tool enables a client to *add new interface commands to the interface tool* and remotely execute the new interface commands, as recited in claim 21. The Examiner asserts that



Chen teaches this limitation of the claimed invention at column 8, lines 5-61. Applicants respectfully disagree.

Chen teaches in Fig. 2 a network environment including an operator consol (62), a network device (64) and a file server (66). The operator consol (62) and the file server (66) include a Unified Command Interface (UCI) (10) that can be utilized to create, update, retrieve, and store network management information in network device (64). Chen teaches that the UCI (10) includes an in-line help facility (20) that can be invoked by typing a "?" at a location in a UCI command line. For example, if the operator simply types "?" at the UCI prompt, UCI will display a list of all operational directives.

In the claimed invention, the user of the client is provided with a pre-defined set of base commands, for example, for a management application in a server. In addition to the base command, the claimed invention enables the user of the client to dynamically add his/her own CLI commands, for example, for plug-in applications. The plug-in applications may be registered with the management application. When a new command is added for a new plug-in application, the claimed invention also enables other clients to locate and learn the new command by downloading a file containing CLI registration information from the server. Chen does not teach that the interface tool enables a client to *add new interface commands to the interface tool* and remotely execute the new interface commands, as recited in the claimed invention.

In light of the above arguments, Applicants respectfully submit that Bach and Chen fail to teach or suggest all of the limitations of claim 21. Applicants therefore request the Examiner to reconsider and withdraw the rejection of claim 21, and pass the claim to allowance.

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**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-085 from which the undersigned is authorized to draw.

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Respectfully submitted,

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